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Attorneys for Defendant Traffic Information, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON PORTLAND
DIVISION

GOOGLE INC., a Delaware corporation,

Civil No.: 09-642-HU

Plaintiff,

v.

TRAFFIC INFORMATION, LLC, a Texas
limited liability company,

Defendant.

**TRAFFIC INFORMATION LLC'S
UNOPPOSED MOTION FOR LEAVE
TO CONDUCT DEPOSITION OF
CALIFORNIA DEPARTMENT OF
TRANSPORTATION ON OR
BEFORE FEBRUARY 3, 2012**

Traffic Information, LLC (“Traffic”) files this motion further to the email of its counsel to Ms. Bartholomew dated January 30, 2012, and seeks leave to take the deposition of the California Department of Transportation on or before February 3, 2012, after the January 30, 2012 discovery deadline. Traffic served a subpoena on the California DOT on January 4, 2012 for the deposition to take place on January 20, 2012. The California Department of Transportation requested that the subpoena be reissued and the deposition was rescheduled for January 30, 2012. Traffic has been in communication with Ms. Jeanne Scherer, counsel for the California DOT in an attempt to work out production of documents and scheduling of the deposition. Ms. Scherer has been diligently investigating the subject matter of the subpoena and attempting to locate knowledgeable witnesses and documents. Ms. Scherer has advised that she can make a relevant witness available for deposition on or before February 3, 2012. Traffic has conferred with Google’s counsel concerning this request and been advised that Google does not oppose this motion.

Wherefore, premises considered, Traffic requests that the Court enter an Order permitting Traffic to take the deposition of the California DOT after close of discussion, but no later than February 3, 2012.

Respectfully submitted:

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